

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.

CRIMINAL NO. 22-342 (SCC)

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OMNIBUS RESPONSE TO DEFENDANT HERRERA'S CIPA FILINGS**

The United States of America requests that the Court grant an extension of time for it to file a response to Defendant Julio Herrera's Motion Regarding Access to Government's CIPA Sec. 4 Filing (ECF No. 860) and his Reply in Support of Motion to Compel Classified Information and Opposition to Exclude (ECF No. 861). The United States would request an extension until June 18, 2025. The United States has consulted with counsel for Mr. Herrera who has no objection to the requested extension of time. In addition, the United States provides the following information for the Court's consideration.

1. On May 15, 2025, Mr. Herrera filed Notices on the public docket regarding the above referenced motions. Due to the logistics related to the classified filings, undersigned counsel was not able to view the motions until May 28, 2025.

2. Accordingly, the United States requests until June 18, 2025, to file an Omnibus Response to Mr. Herrera's filings.

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 30th day of May, 2025.

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